



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WK:VC
F. #2023R00955

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 18, 2024

By ECF

The Honorable Nina R. Morrison
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Joseph Grunwald
Criminal Docket No. 24-19 (NRM)

Dear Judge Morrison:

The government respectfully writes to request that a proposed stipulation concerning discovery materials that contain personally identifiable information regarding individuals other than the defendant, as well as documents and materials that identify, or tend to identify, victims or witnesses, be so ordered by the Court. The government makes this application because there is a significant amount of such discovery materials to be produced to the defendant, and it believes that the proposed stipulation will enable expedited production of those materials. The proposed stipulation and order, which has been signed by all parties, is respectfully enclosed for the Court's consideration.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/ Vincent Chiappini
Vincent Chiappini
Assistant U.S. Attorney
(718) 254-6299